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et al.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

19 FRANK SANTOS, DIANE QUALLS, and  
20 REBECCA JOHNSON, on behalf of  
21 themselves and all others similarly situated,  
Plaintiffs,

22 v.

23 COUNTY OF ALAMEDA, BOARD OF  
24 SUPERVISORS OF ALAMEDA COUNTY,  
25 ALAMEDA COUNTY SOCIAL SERVICES  
26 AGENCY, and CHET HEWITT, in his  
capacity official capacity as Director of the  
Alameda County Social Services Agency; and  
DOES 1-10, inclusive,  
Defendants.

Case No. C04-02725 (JCS)

**JOINT STIPULATION RE: EXTENSION  
OF TIME TO NEGOTIATE  
ATTORNEYS' FEES AND COSTS:  
REQUEST FOR COURT ORDER**

JUDGE: Hon. Joseph C. Spero  
DEPT: Courtroom 15<sup>th</sup> Floor

## STIPULATION

On October 5, 2005 the Court approved the Settlement Agreement in the above-referenced case. Section XI of the Agreement, Attorneys' Fees, Costs and Expenses, provides:

The resolution of Plaintiffs' claims for attorneys' fees, costs and expenses remains under the jurisdiction of the Court. The parties agree to meet and confer to attempt to settle all claims for attorneys' fees, costs and expenses for any work performed by Plaintiffs' counsel and their firms in connection with this litigation up until the date this Agreement is approved by the Court. If the parties are unable to reach an agreement within 90 days from the effective date of this agreement, Plaintiffs may file a motion with the Court for an award of reasonable attorneys' fees, costs and expenses.

Counsel for plaintiffs and defendants have agreed to extend their deadline for meeting and conferring to attempt to settle plaintiffs' claims for attorneys' fees and costs from January 5, 2005 to March 6, 2005. Because the resolution of attorneys' fees and costs is under the jurisdiction of the Court, the parties are requesting that the Court authorize this stipulated modification of their Agreement.

Respectfully Submitted,

DATED: December 21, 2005

Kevin Knestrick  
DISABILITY RIGHTS ADVOCATES  
449 15th Street, Suite 303  
Oakland, California 94612

By:

Kevin Knestrick  
Attorneys for Plaintiffs

DATED: \_\_\_\_\_, 2005

Richard E. Winnie  
Jason F. Lauren  
OFFICE OF THE COUNTY COUNSEL,  
COUNTY OF ALAMEDA  
1221 Oak Street, Suite 450  
Oakland, California 94612-4296

By:

Calvin C. James  
Attorneys for Defendant

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17 Kevin Knestrick  
18 DISABILITY RIGHTS ADVOCATES  
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Oakland, California 94612

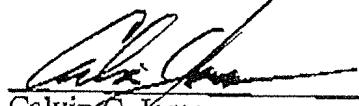
20 By:

21 Kevin Knestrick  
22 Attorneys for Plaintiffs

23 DATED: \_\_\_\_\_, 2005

24 Richard E. Winnie  
25 Jason F. Lauren  
26 OFFICE OF THE COUNTY COUNSEL,  
COUNTY OF ALAMEDA  
1221 Oak Street, Suite 450  
27 Oakland, California 94612-4296

28 By:

  
Calvin C. James  
Attorneys for Defendant

1 IT IS SO ORDERED

2 DATED: Jan. 3, ~~2005~~<sup>2006</sup>

3   
The Honorable Joseph C. Spero

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